

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

REV. XIU HUI “JOSEPH” JIANG,)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:15-cv-01008-CEJ
)	
TONYA LEVETTE PORTER, et al.,)	
)	
Defendants.)	

**DEFENDANT N.M.’S CONSENT MOTION FOR EXTENSION
OF TIME TO RESPOND TO COMPLAINT AND
SUGGESTIONS IN SUPPORT THEREOF**

Defendant N.M. requests an extension of time, to and including August 11, 2015, to Answer or other respond to Plaintiffs’ Complaint.

Plaintiff’s Complaint consists of 32 pages and alleges four counts against Defendant N.M. The undersigned counsel only met Defendant N.M. for the first time on July 15, 2015 and needs additional time to investigate the facts and research the legal issues. Plaintiff’s counsel consents to this extension. This motion is not expected to prejudice any party or unduly delay these proceedings.

Respectfully submitted,

CHACKES, CARLSON & GOROVSKY LLP

/s/Kenneth M. Chackes

Kenneth M. Chackes, MO27534

Nicole E. Gorovsky, MO51046

906 Olive Street, Suite 200

St. Louis, Missouri 63101

Phone: (314) 872-8420

Fax: (314) 872-7017

kchackes@cch-law.com

ngorovsky@cch-law.com

CERTIFICATE OF SERVICE

The undersigned certifies that on this 20th day of July, 2015, the foregoing Motion was filed electronically with the Clerk of Court, therefore to be served electronically by operation of the Court's electronic filing system, upon the Attorney for Plaintiff, D. John Sauer, and the Attorney for Defendants Porter, Pitterle, and City of St. Louis, J. Brent Dulle.

/s/ Kenneth M. Chackes